REMARKS

This response does attempt to introduce new matter into the present application for invention. Therefore, the Applicant, respectfully, requests that this response be entered in and that the claims to the present application, kindly, be reconsidered.

The Final Office Action dated April 14, 2005 has been received and considered by the Applicants. Claims 1-20 are pending in the present application for invention.

The Final Office Action rejects Claims 1-20 under the provisions of 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,182,116 issued to Namma et al. (hereinafter referred to as Namma et al.). The MPEP at §2131 states that a "claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Regarding Claim 1, the Examiner states that Namma et al. disclose a peer distributed, embedded web server system accessing and controlling a multiplicity of devices as defined by rejected Claim 1. The Examiner's position is that Fig. 9, item 91 of Namma et al. disclose a master control device comprising an embedded web server, peer interface module, and host software and a plurality of linked devices comprising an interface that communicate with the peer interface module of the master control device controlled by the embedded web server in Fig. 9 as items 21 and 31. The Applicant, respectfully, disagrees. There is no peer interface module disclosed or suggested within Namma et al. The Applicant, respectfully, points out that Namma et al. clearly teach communications that takes place through the use of World Wide Web (WWW) servers and browsers (see Namma et al. col. 21, line 9-col. 22, line 22) to transfer HTML files via http communication. Communication through WWW servers and browsers to transfer HTML files via http communications is not equivalent to communication through peer to peer interface modules. Namma et al. can not anticipate the rejected claims if each and every element as set forth in the rejected claim is not found within Namma et al. The Examiner contends that Namma et al. teach peer interface modules. The Applicant, respectfully, points out that peer to peer file transfer does not involve the use of clients and servers as taught by the system of Namma et al. Peer to peer transfer employs nodes simultaneously function as both clients and servers with other nodes on the network.

Accordingly, the Applicant does not agree with this assertion contain in the Final Office Action. Therefore, this rejection is respectfully traversed.

Regarding Claim 2, the rejection contained within the Final Office Action contends that Namma et al. teach that the peer distributed embedded web server system that can access and control a multiplicity of devices. As previously discussed, Namma et al. do not disclose or suggest peer interface modules. Therefore, Claim 2 is believed to be allowable and this rejection is, respectfully, traversed.

Regarding Claim 3, the rejection contained within the Final Office Action contends that Namma et al. teach a peer distributed, embedded web server system for accessing and controlling a multiplicity of devices in accordance, wherein said master control device and the plurality of linked devices each comprises a device from the group of digital video recorder, digital video encoder, and network camera. The Applicants would like to, respectfully, point out that rejected Claim 3 incorporates the subject matter of Claim 1 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 4, the rejection contained within the Final Office Action contends that states that Namma et al. teach the peer distributed, embedded web server system for accessing and controlling a multiplicity of devices, whercin each of said plurality of linked devices has a digital video recorder operatively connected to at least one camera. The Applicant, respectfully, points out that rejected Claim 4 incorporates the subject matter of Claim 3 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 5, the rejection contained within the Final Office Action contends that Namma et al. teach a peer distributed, embedded web server system for accessing and controlling a multiplicity of devices, wherein said master control device and said linked devices are each operatively connected to at least one camera. The Applicant, respectfully, points out that rejected Claim 5 incorporates the subject matter of Claim 1 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 6, the rejection contained in the Final Office Action asserts that Namma et al. disclose a peer distributed, embedded web server system for accessing and controlling a

multiplicity of devices in accordance with Claim 5, wherein said web browser provides HTTP commands to said master control device for receiving a video stream from at least one of said predetermined EWS devices in said EWS system. The Applicant, respectfully, points out that rejected Claim 6 incorporates the subject matter of Claims 1 and 5 for peer to peer interface modules. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 7, the Examiner states Namma et al. disclose a peer distributed, embedded web server system accessing and controlling a multiplicity of devices comprising: a master control device comprising an embedded web server, peer interface module, and host software; a plurality of linked devices that communicate with, and that are controlled by, said embedded web server of said master control device. The Examiner's position is that Fig. 9, item 91 of Namma et al. disclose a master control device comprising an embedded web server, peer interface module, and host software and a plurality of linked devices comprising an interface that communicate with the peer interface module of the master control device controlled by the embedded web server in Fig. 9 as items 21 and 31. The Applicant, respectfully, disagrees. There is no peer interface module disclosed or suggested within Namma et al. The Applicant, respectfully, points out that Namma et al. clearly teach communications that takes place through the use of World Wide Web (WWW) servers and browsers (see Namma et al. col. 21, line 9-col. 22, line 22) to transfer HTML files via http communication. Communication through WWW servers and browsers to transfer HTML files via http communications is not equivalent to communication through peer to peer interface modules. Namma et al. can not anticipate the rejected claims if each and every element as set forth in the rejected claim is not found within Namma et al. The Examiner contends that Namma et al. teach peer interface modules. The Applicant, respectfully, points out that peer to peer file transfer does not involve the use of clients and servers as taught by the system of Namma et al. Peer to peer transfer employs nodes simultaneously function as both clients and servers with other nodes on the network. Accordingly, the Applicant does not agree with this assertion contain in the Final Office Action. Therefore, this rejection is respectfully traversed.

Regarding Claim 8, the rejection contained within the Final Office Action asserts that Namma et al. disclose a embedded web server system for accessing and controlling a multiplicity of devices in accordance with Claim 7, wherein said plurality of linked devices each comprises

peer interface means for communicating with the peer interface means of said master control device. The Applicant, respectfully, points out that rejected Claim 8 incorporates the subject matter of Claim 7 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 9, the rejection contained within the Final Office Action asserts that Namma et al. disclose an embedded web server system for accessing and controlling a multiplicity of devices, wherein the master control device and the plurality of linked devices each comprise a digital video recorder. The Applicant, respectfully, disagrees. Claim 9 incorporates the subject matter of Claim 7 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 10, the rejection contained within the Final Office Action asserts that Namma et al. disclose the embedded web server system for accessing and controlling a multiplicity of devices, wherein the master control device and the linked devices are each operatively connected to at least one camera. The Applicant, respectfully, disagrees. Claim 10 incorporates the subject matter of Claim 7 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 11, the rejection in the Final Office Action asserts that the embedded web server system for accessing and controlling a multiplicity of devices in accordance with Claim 10, wherein said web browser provides HTTP commands to said master control device for receiving a video stream from at least one of said predetermined devices in said EWS system. The Applicant, respectfully, disagrees. Claim 11 incorporates the subject matter of Claims 7 and 10 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 12, the rejection contained within the Final Office Action asserts that Namma et al. disclose a peer distributed, embedded web server system accessing and controlling a multiplicity of devices as defined by rejected Claim 1. The Examiner's position is that Fig. 9, item 91 of Namma et al. disclose a master control device comprising an embedded web server, peer interface module, and host software and a plurality of linked devices comprising an

interface that communicate with the peer interface module of the master control device controlled by the embedded web server in Fig. 9 as items 21 and 31. The Applicant, respectfully, disagrees. There is no peer interface module disclosed or suggested within Namma et al. The Applicant, respectfully, points out that Namma et al. clearly teach communications that takes place through the use of World Wide Web (WWW) servers and browsers (see Namma et al. col. 21, line 9-col. 22, line 22) to transfer HTML files via http communication. Communication through WWW servers and browsers to transfer HTML files via http communications is not equivalent to communication through peer to peer interface modules. Namma et al. can not anticipate the rejected claims if each and every element as set forth in the rejected claim is not found within Namma et al. The Examiner contends that Namma et al. teach peer interface modules. The Applicant, respectfully, points out that peer to peer file transfer does not involve the use of clients and servers as taught by the system of Namma et al. Peer to peer transfer employs nodes simultaneously function as both clients and servers with other nodes on the network. Accordingly, the Applicant does not agree with this assertion contain in the Final Office Action. Therefore, this rejection is respectfully traversed.

Regarding Claim 13, the rejection contained within the Final Office Action contends that Namma et al. teach that the peer distributed embedded web server system that can access and control a multiplicity of devices. As previously discussed, Namma et al. do not disclose or suggest peer interface modules. Therefore, Claim 13 is believed to be allowable and this rejection is, respectfully, traversed.

Regarding Claim 14, the rejection contained within the Final Office Action asserts that Namma et al. disclose a peer distributed, embedded web server system for accessing and controlling a multiplicity of devices, wherein each of said plurality of linked devices comprises a device from the group of a digital video recorder, a digital video encoder and networked camera. The Applicant, respectfully, points out that rejected Claim 14 incorporates the subject matter of Claim 12 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 15, the rejection within the Final Office Action asserts that Namma et al. teach the peer distributed, embedded web server system for accessing and controlling a multiplicity of devices, wherein each of said plurality of linked devices has a digital video recorder operatively connected to at least one camera. The Applicant, respectfully, points out

that rejected Claim 15 incorporates the subject matter of Claim 14 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 16, the rejection within the Final Office Action asserts that Namma et al. disclose the peer distributed, embedded web server system for accessing and controlling a multiplicity of devices, wherein the master control device and the plurality of linked devices are operatively connected to at least one camera. The Applicants would like to, respectfully, point out that rejected Claim 16 incorporates the subject matter of Claim 12 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 17, the rejection within the Final Office Action asserts that Namma et al. teach the peer distributed, embedded web server system for accessing and controlling a multiplicity of devices, wherein the web browser provides HTTP commands to the master control device for receiving a video stream from at least one of said predetermined EWS devices. The Applicant, respectfully, points out that rejected Claim 17 incorporates the subject matter of Claim 16 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 18, the rejection within the Final Office Action asserts that Namma et al. disclose the peer distributed, embedded web server system for accessing and controlling a multiplicity of devices, wherein the web browser allows each of the linked devices to be viewed by the master control device. The Applicant, respectfully, points out that rejected Claim 18 incorporates the subject matter of Claim 12 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 19, the rejection within the Final Office Action asserts that Namma et al. teach the peer distributed, embedded web server system for accessing and controlling a multiplicity of devices, wherein a web page within the web browser allows incorporation of additional linked devices into the distributed server system. The Applicant, respectfully, points out that rejected Claim 19 incorporates the subject matter of Claim 18 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

Regarding Claim 20, the rejection within the Final Office Action asserts that Namma et al. teach the peer distributed, embedded web server system for accessing and controlling a multiplicity of devices, wherein the web page provides address entry of at least one additional linked device and incorporation of the at least one additional device into the viewer. The Applicant, respectfully, points out that rejected Claim 20 incorporates the subject matter of Claim 19 for peer to peer interface. As previously discussed, Namma et al. do not disclose or suggest any form of peer to peer interface. Therefore, this rejection is respectfully traversed.

In view of the foregoing discussion, Namma et al. do not anticipate the rejected claims because every element as set forth in the claims are not found within Namma et al.

Applicant is not aware of any additional patents, publications, or other information not previously submitted to the Patent and Trademark Office which would be required under 37 C.F.R. 1.99.

In view of the foregoing amendment and remarks, the Applicant believes that the present application is in condition for allowance, with such allowance being, respectfully, requested.

Respectfully submitted,

By _____

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